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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

PAUL ROBESON,

Defendant.

) CASE NO. CR-3-13-0453 EMC

)
) STIPULATION AND [PROPOSED] ORDER
) CONTINUING STATUS CONFERENCE DATE
) AND DOCUMENTING EXCLUSION OF TIME
) UNDER THE SPEEDY TRIAL ACT

1 The parties appeared before this Court in this matter on August 21, 2013 for status conference.
2 Assistant United States Attorney Damali Taylor appeared on behalf of the United States. Winston Chan,
3 Esquire, appeared on behalf of the defendant, Paul Robeson, who was present and in custody. At the
4 time, the parties set the matter for further status for October 9, 2013.

5 The parties hereby request that the date for status conference, currently October 9, 2013, be
6 continued until November 20, 2013 so that the defense may review discovery in this case. The
7 government is also in the process of providing additional discovery to defense counsel. The parties
8 further request that, given the need to gather and examine discovery, time continue to be excluded under
9 the Speedy Trial Act until November 20, 2013. Defense counsel believes that it is in the best interests of
10 the defendant to do so. The government agrees. To date, no time has elapsed under the Speedy Trial
11 Act. The parties agree that the ends of justice served by granting such an exclusion of time outweigh the
12 best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

13
14 SO STIPULATED:

15 DATED: October 2, 2013

MELINDA HAAG
United States Attorney

17 _____
/s/
DAMALI A. TAYLOR
Assistant United States Attorney

19
20 DATED: October 2, 2013

21 _____
/s/
WINSTON CHAN
Counsel for Defendant

[[PROPOSED] ORDER

For the foregoing reasons, the Court HEREBY ORDERS that the status conference in this matter is re-set to November 20, 2013, at 2:30 p.m., before the Honorable Edward M. Chen. The Court finds that the failure to grant the requested extension would deny counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The Court finds that the ends of justice served by granting the requested extension outweigh the best interests of the public and the defendant in a speedy trial and in the prompt disposition of criminal cases. The Court also concludes that an exclusion of time through and including November 20, 2013, should be made under Title 18, United States Code, Sections 3161(h)(7)(A) and 3161(h)(7)(B)(iv). The Court also finds that the ends of justice served by an exclusion of time through and including November 20, 2013 outweigh the best interest of the public and the defendant in a speedy trial. Id. § 3161(h)(7)(A).

IT IS SO ORDERED.

DATED: 10/7/13

